

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	
Consideration of the federal standard on	)	06-0525
interconnection in Section 1254 of the	)	
Energy Policy Act of 2005	)	

**REPLY COMMENTS OF COMMONWEALTH EDISON COMPANY**

Commonwealth Edison Company ("ComEd") submits these reply comments in response to the Commission's Order of July 26, 2006 ("Order") initiating this proceeding.

There is much on which the parties agree. IEEE Standard 1547 provides a sound basis for the interconnection of small generators, but utility specific modifications are required to make that broad standard function as an interconnection rule. In considering those modifications, the Commission should benefit from the work already done at PJM and by the utilities themselves. Further, ComEd urges the Commission not to make a precipitous decision to require either statewide rules or individual tariff filings to address interconnection procedures. Experience with Retail Electric Suppliers and related open access rules strongly suggest that there are other alternatives, including the use of public "manuals," that have much to offer. Moreover, it is likely that substantial benefit could be achieved by referring both the substance of the interconnection procedures and the manner in those procedures are memorialized to workshop discussions by the parties.

**I. Utility-Specific Clarifications and Modifications to IEEE Standard 1547 Should Be Permitted.**

ComEd agrees with Staff that:

[T]he primary purpose of this docket is for the Commission to decide whether or not to adopt the federal interconnection standard. It must make this decision by August 8, 2007.

If the Commission decides to adopt the federal interconnection standard, it may also implement agreements and procedures related to interconnection at its discretion.

Section 1.3 of IEEE 1547 clearly indicates that it is applicable only to on-site generation facilities with aggregate capacities of 10MVA or less. ... But since EPAct identifies only IEEE 1547, and the purpose of this proceeding is to determine whether the Commission should adopt the standard in EPAct, the requirements of standards other than IEEE 1547 that might apply to larger-size inter-connectors need not be discussed in this proceeding.

Staff Comments at 1, 12.

ComEd, Ameren, and MidAmerican all filed comments agreeing with the EPAct assumption that IEEE Standard 1547 provides a sound basis for the interconnection of small generators to the electric network. However, they also pointed out that the standard is articulated at a relatively high level and needs further clarification to give it application to real-world generators, utility operating systems, and electric networks. See Ameren Comments at 7; MidAmerican Comments at 4.

In that regard, ComEd reported that a diverse group of stakeholders (including the National Renewable Energy Laboratory (NREL)) had already convened in a special working group and developed PJM-specific clarifications to IEEE 1547. The two resulting PJM manuals, which will be finalized in the next few weeks, will set forth the criteria to evaluate interconnection requests (20MW and below) for the purpose of determining interconnection design and construction requirements within the PJM footprint for generators that intend to participate in the wholesale energy market and will offer clarifications on many of the IEEE 1547 technical standards and requirements.

Also, ComEd noted that, with its sister company PECO, it developed two sets of revised interconnection guidelines in light of, and consistent with, recent FERC, PJM, and state agency activity and with a determined intent to standardize (and, therefore, facilitate) interconnections in a non-discriminatory way. Those documents are now available and were included with ComEd's

comments for the Commission's reference. "Exelon Energy Delivery Interconnection Guidelines for Generators 2 MVA or Less" provides interconnection guidelines for small generators 2 MVA or less. "Exelon Energy Delivery Interconnection Guidelines for Generators Greater than 2 MVA and Less than 20 MVA" contains interconnection guidelines for these larger generators. As noted previously, these new Exelon Energy Delivery (EED) guidelines are compatible with PJM's new Technical Requirements and Standards, *supra*, and are compliant with FERC Order 2006. They are also "tiered" as suggested by the Environmental Law and Policy Center ("ELPC") in its comments. Again, as provided in the first document, generators that are compliant with IEEE 1547.1 and meet the specified screening criteria will be given an expedited process, very similar to that described in Appendix E of FERC Order 2006 (provided that no other ComEd system modifications are required).

In conclusion on this point, IEEE Standard cannot stand by itself as a technical interconnection standard. If the Commission decides to adopt IEEE Standard 1547 for small ( $\leq 10$ MVA) interconnections to electric utilities' distribution (i.e., ICC jurisdictional) systems, the Commission should permit utilities to specify exceptions and clarifications appropriate for their networks and systems, consistent with those specified for FERC-jurisdictional interconnections to the extent technically appropriate.

## **II. Workshops Should Address not only Procedures, but also the Manner in Which They are Made Available to the Public.**

There is support for the proposition that workshops would provide an opportunity for the parties to engage in a dialog about their concerns and perhaps to come to a consensus concerning details of how each utility offers such interconnection – i.e., the procedural issues.<sup>1</sup> See Ameren at 11, Staff at 13. ComEd concurs. Informal talks among the parties seems to indicate that there

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<sup>1</sup> ComEd agrees with Staff that this process need not be completed by the federal August 8 deadline. Staff Comments at 1.

is a common interest in exploring the possibility of agreeing to a “tiered” interconnection regime that recognizes difference in complexity of different interconnections and provides greater flexibility concerning timelines and fees for interconnections of greater complexity.

However, not only the procedural issues should be discussed in these workshops, but also the vehicle by which they would be implemented by each utility – i.e., Commission rule, utility tariff, manual or procedure publicly available (e.g., on a utility website), or some combination thereof.

In this regard, the ELPC urges the Commission to adopt uniform statewide procedural rules, arguing that discontinuities between utility rules are a burden for potential interconnectors and for the Commission itself in enforcing reasonable interconnection practices. With respect to the first concern, for the smallest interconnectors – the ones that would be covered by IEEE Standard 1547 and the ones ELPC characterizes as “Illinois businesses, consumers, farmers, and homeowners”<sup>2</sup> – uniformity across all Illinois utilities will be of little importance since very few interconnectors, if any, will be trying to interconnect to more than one Illinois utility.

With respect to the second concern, ComEd notes that it is not a common practice for the Commission, by rule, to mandate uniformity of utility procedures. Indeed, even where the Commission has acted by rule, provisions that recognize differences between different utilities are common. E.g., 83 Ill. Admin. Code Part 411, Subpart B (requirements applicable to all utilities), Subpart C (requirements applicable only to ComEd). Moreover, as Staff indicates, Illinois utilities either have already implemented the IEEE standard or are in the process of doing so, and a procedural rulemaking would be untimely before these implementation efforts had been given a chance to work. In short, each utility should be permitted the ability to tailor its interconnection procedures to the requirements of its own systems and processes.

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<sup>2</sup> ELPC Comments at 9.

Nonetheless, ComEd must also respectfully disagree with Staff's request that the Commission, at this time, order utilities to tariff their interconnection procedures. As MidAmerican and Ameren point out, there are some significant disadvantages to all parties with having detailed procedures set forth in tariffs. In addition, there is very little precedent for utilities including detailed procedures in their tariffs, let alone for the Commission *affirmatively ordering* utilities to include such procedures in tariffs. By way of example, ComEd notes that its procedures for Retail Electric Suppliers to submit notices of customers' supplier elections is not tariffed, but rather appears in ComEd's RES Handbook available on a ComEd web site. These procedures have been implemented successfully and have a history of being accessible to all, of being efficient to work with and modify as required, and of being applied fairly and in a non-discriminatory manner.

Moreover, there is no need for the Commission to make a decision at this time about the way in which utility interconnection procedures must be "memorialized – whether by rule, tariff, publicly available document, or some combination thereof. Instead, ComEd suggests that this issue be included with the other procedural issues that the parties discuss in the workshops. The advantages and disadvantages of each option for all parties can be reviewed, and discussions may well result in a consensus on this point as well.

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Respectfully submitted,  
COMMONWEALTH EDISON COMPANY

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### **Certificate of Service**

I, Michael S. Pabian, hereby certify that I have served a copy of the foregoing Reply Of Commonwealth Edison Company on the parties by electronic mail, this 14<sup>th</sup> day of February, 2007.

A handwritten signature in black ink, appearing to read "Michael S. Pabian", written over a horizontal line.

Michael S. Pabian